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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALLAN ROTHSTEIN,

Petitioner,

v.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, SHERIFF JOE LOMBARDO

Respondents,

Case No. 2:15-cv-01012-JCM-GWF

STIPULATION AND ORDER TO EXTEND PETITIONER'S REPLY TO RESPONSE
TO PETITION FOR WRIT OF MANDAMUS

(First Request)

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and make a joint application to extend the Petitioner's Reply to Response to Petition for Writ of Mandamus [ECF 7].

1. Petitioner filed a Petition for Writ of Mandamus in the Eighth Judicial District Court on May 4, 2015 [ECF 1];
2. On June 2, 2015 the Respondents removed the action to the U.S. District Court [ECF 1];
3. The Respondents filed a Response to Writ of Mandamus on June 26, 2015 [ECF 7];
4. The Petitioner's Reply is due on July 6, 2015;

1 5. Petitioner seeks to extend the Reply by seven (7) days up to and including
2 Monday, July 13, 2015;

3 6. The Petitioner seeks an extension as his counsel has been unable to complete the
4 Reply since the filing of the Response for the following reasons:

5 (a) Petitioner's counsel had five (5) depositions the week of June 29 through
6 July 3;

7 (c) Petitioner's counsel had eight (8) court hearings the week of June 29
8 through July 3;

9 (d) Petitioner's counsel had three (3) substantive motions, including
10 dispositive motions, due July 2, 3, and 4;

11 7. Additionally, Petitioner's counsel seeks a one week extension because Petitioner's
12 counsel has the following upcoming deadlines and conflicts:

13 (a) a Response to Motion for Partial Summary Judgment and Joinder, which
14 was extended to July 7, 2015 (*Sumner v. Summerlin Hospital, et al.*);

15 (b) Replies to a Motion for 56(f) Relief and to Amend Complaint due on July
16 9, 2015 (*Layman v. NDOC, et al.*);

17 (c) a preliminary hearing on July 9, 2015 (*State of Nevada v. Worthen*); and

18 (d) two (2) previously extended Oppositions to Motions for Summary
19 Judgment due on July 10, 2015 (*Plank v. LVMPD, et al.*);

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8. For the reasons listed above, Petitioner's counsel seeks a seven (7) day extension, up to and including July 13, 2015, to reply to the Response to Petition for Writ of Mandamus;

9. This is the first request for enlargement of time and is made in good faith and not for the purposes of delay.

APPROVED AS TO FORM AND CONTENT.

DATED this 6th day of July, 2015.

POTTER LAW OFFICES

By /s/ C. J. Potter, IV, Esq.

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DATED this 6th day of July, 2015.

MARQUIS AURBACH COFFING

By /s/ Jack F. DeGree, Esq.

NICK D. CROSBY, ESQ.

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Attorneys for Respondents

ORDER

IT IS SO ORDERED.

Dated July 7, 2015.



U.S. DISTRICT COURT JUDGE